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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

MYRA ADNEY,)		
)		
)		
Plaintiff,)		
)		
vs.)		
)		
WALMART, INC. d/b/a)		
WALMART SUPERCENTER)		
#2074)		
)		
Defendant.)	Case No. 3PA-22	CI
_____)		

COMPLAINT

NOW COMES the Plaintiff, MYRA ADNEY, by and through her undersigned attorneys, Crowson Law Group, and sues Defendant, WALMART, INC. d/b/a WALMART SUPERCENTER #2074 (hereinafter "WALMART"), and alleges as follows:

1. Plaintiff MYRA ADNEY, for all times mentioned herein, was and is a resident of the Matanuska-Susitna Borough, Town of Wasilla, State of Alaska.

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2. Defendant WALMART is authorized under the laws of the State of Alaska to do business in Alaska.

3. Defendant WALMART SUPERCENTER #2074 is believed to be owned by WALMART, INC. and organized for the purpose of providing department store goods in Wasilla, Alaska. The registered agent for WALMART is CT Corporation System located at 9360 Glacier Highway, Suite 202, Juneau, AK 99801.

4. Service will be made through its registered agent, CT Corporation System located at 9360 Glacier Highway, Suite 202, Juneau, AK 99801.

5. The fall described below occurred in the Matanuska-Susitna Borough, and, as a result, venue properly lies with this court.

6. Jurisdiction properly lies with this honorable court.

7. That on or about December 4, 2020, Plaintiff MYRA ADNEY was traversing the sidewalk in front of the Brown-Jug entrance to WALMART when she slipped on ice on the sidewalk outside the store, crashing forcefully down onto the ground causing her injury.

8. That WALMART did not ensure the safety of its guests by taking steps to de-ice the sidewalks and other common areas of WALMART.

9. As a direct and proximate result of WALMART'S negligent maintenance of the outside common areas of WALMART, Plaintiff ADNEY suffered severe and permanent physical injury.

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10. As a direct and proximate result of WALMART'S actions in failing to maintain the outside common areas of WALMART such that the guests of WALMART could traverse the property in a safe manner, ADNEY suffered physical injury and severe emotional distress.

11. As a direct and proximate result of WALMART'S negligent actions, ADNEY incurred medical bills and expenses; and was caused to endure pain and suffering for which ADNEY, will be required to expend and become liable for, expenses relating to future medical care and services.

12. WALMART had a duty to ensure that it was managed and maintained in a way to ensure the safety of its guests.

13. That on the occasion in question WALMART was negligent in the following particulars, among others, to-wit:

- a. Failure to maintain the safety of its guests by removing known hazards such that guests could safely enter and exit its store;
- b. Negligent operation of its property; and
- c. Was otherwise careless and negligent in the operation of its premises.

14. That the incident described herein was solely due to the actions of WALMART without any comparative negligence or recklessness by ADNEY.

15. As a direct and proximate result of the incident described above, ADNEY, was caused to sustain severe and permanent injury; caused to incur *Adney v. Walmart*

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medical bills and expenses; and was caused to endure pain and suffering. Furthermore, ADNEY, was precluded from enjoying her usual avocations.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff MYRA ADNEY prays judgment against the Defendant, WALMART, INC. d/b/a WALMART SUPERCENTER #2074, as follows:

1. For general damages including, but not limited to, pain and suffering and mental anguish both in the past and in the future.
2. For all past and future medical and incidental expenses according to proof.
3. For all lost wages past and future according to proof.
4. For costs of suit herein incurred.
5. That this case be tried by jury.
6. For any and all other damages and relief to which ADNEY, is entitled under the laws of the State of Alaska.

Respectfully submitted on this the 15th day of July 2022.

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